

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

V.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Nancy L. Maldonado
Honorable Heather K. McShain

**MOTION BY PLAINTIFF UNITED STATES SECURITIES AND EXCHANGE
COMMISSION TO QUASH THIRD-PARTY SUBPOENA AND FOR PROTECTIVE
ORDER**

Plaintiff United States Securities and Exchange Commission (“SEC”) respectfully files this motion to quash a third-party subpoena, and for a protective order regarding two deposition notices, issued by Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”). In support of this motion, the SEC states as follows:

1. Defendants have issued a third-party deposition subpoena to a former SEC employee, Jeffrey Riedler (“Riedler”).

2. Additionally, Defendants have issued deposition notices for the depositions of current SEC employee Bonnie Gauch (“Gauch”) and for a representative of the SEC to testify about various matters pursuant to Federal Rule of Civil Procedure 30(b)(6).

3. The Riedler deposition subpoena and the Gauch and Rule 30(b)(6) deposition notices seek information that is irrelevant, not proportional to the needs of the case, duplicative of written discovery, and protected from disclosure by applicable privileges. Accordingly, the SEC respectfully moves this Court to quash the Riedler deposition subpoena and to issue a protective order prohibiting the Gauch and Rule 30(b)(6) depositions noticed by Defendants.

4. In accordance with Local Rule 37.2, counsel for the SEC telephonically conferred with counsel for the Defendants on November 22, 2022, in a good-faith effort to resolve the differences raised in this motion, but were unable to reach an accord over these issues. (The parties resolved their differences over a third deposition notice issued by Defendants as a result of the meet-and-confer process).

5. The SEC is contemporaneously filing a Memorandum in Support of this motion, with exhibits thereto.

WHEREFORE, the SEC respectfully requests that the Court: (i) grant this Motion in its entirety; (ii) quash Defendants' third-party deposition subpoena to Jeffrey Riedler; (iii) issue a protective order prohibiting the noticed depositions of Bonnie Gauch and a Rule 30(b)(6) representative of the SEC; and (iv) grant such other and further relief as this Court deems just.

Dated: December 5, 2022

Respectfully submitted,

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION**

/s/ Eric M. Phillips

By: One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on December 5, 2022, he caused the foregoing Motion and accompanying Memorandum in Support to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which shall send notification of such filing to the following counsel of record:

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